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Attorneys for State Defendants Hormann, Krings, Riddle and Wilcox

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINSTRATOR OF THE  
ESTATE OF DAVE HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY,

Defendants.

Case No. 6:20-cv-1163-MK

DECLARATION OF JESSE B. DAVIS

I, Jesse B. Davis, declare:

1. I am an attorney licensed to practice law in the State of Oregon and am a Senior Assistant Attorney General for the State of Oregon. I am one of the attorneys assigned to represent Defendants Susan Hormann, Mary Krings, John Riddle and Kathy Wilcox (“State Defendants”) in the above-captioned case.

2. The current deadline for all defendants to file their responses to the First Amended Complaint for Damages is **November 10, 2021**. State Defendants request an extension of time up to and including **December 1, 2021** for all defendants to do so. This is the first request to extend this deadline.

3. State Defendants request additional time to file their responses due to the need to prepare for depositions in this case scheduled to take nearly three full weeks during December 2021, as well as trials in two other cases scheduled during early January 2022.

4. Upon conferral with counsel for Plaintiffs regarding this motion, Plaintiffs do not oppose the motion.

5. This request is made in good faith and not for purposes of delay.

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED November 9, 2021.

s/ Jesse B. Davis  
JESSE B. DAVIS  
Senior Assistant Attorney General